JS 44 (Rev. 12/12)

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

purpose of illitiating the civil do	CREUSHEEL. (SEE INSTRUCTI	UNS UN NEAT LAG.	E OF III	15 1 O M12.)				
I. (a) PLAINTIFFS The United States of America				DEFENDANTS				
				ROBERT YOUNG				
				4820 N. Warnock Stree				
				Philadelphia, PA 1914				
(b) County of Residence of First Listed Plaintiff				County of Residence	of First Listed Defendant Phila	delphia		
	CEPT IN U.S. PLAINTIFF CAS	ES)		County of Residence of First Listed Defendant Philadelphia				
parent an old realiting to though				NOTE:	IN LAND CONDEMNATION CATHE TRACT OF LAND INVOLV	ASES, USE THE LOCATION OF		
					THE TRACT OF LAND INVOLV	ED,		
(c) Attorneys (Firm Name, A	ddress, and Telephone Number)			Attorneys (If Known)				
KML Law Group	p, P.C. – Thomas I. F et, Ste. 5000, Phila.,	'uleo, Esquire	;					
701 Market Stree	et, Ste. 5000, Phila.,	PA 19106						
213-627-1322, 1	Puleo@kmllawgroup	p.com						
II. BASIS OF JURISDI	CTION (Place on "V" in C	na Roy Onhi)	III. C	CITIZENSHIP OF PRI	NCIPAL PARTIES (Place	re an "X" in One Box for Plaintiff		
II. DASIS OF TURISDI	,	ne Box Only)	````	(For Diversity Cases Only)		and One Box for Defendant)		
X 1 U.S. Government Plaintiff	3 Federal Question (U.S. Government Not a Party)  4 Diversity				F DEF <ol> <li>X 1 Incorporated or Prin</li> </ol>	PTF DEF		
Hammi			of Business In This State					
2 U.S. Government			Citizen of Another State 2 2 Incorporated and Principal Place 5 5					
Defendant	(Indicate Citizenship of	Parties in Item III)			of Business In A	nother State		
				Citizen or Subject of a	3 3 Foreign Nation	6 6		
				Foreign Country				
IV. NATURE OF SUIT	(Place an "X" in One Box On	ly)						
CONTRACT	TOR	RTS	maya yaya	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES		
110 Insurance	PERSONAL INJURY	PERSONAL INJ	URY	625 Drug Related Seizure	422 Appeal 28 USC 158	375 False Claims Act		
120 Marine	310 Airplane	365 Personal Injur		of Property 21 USC 881 690 Other	423 Withdrawal 28 USC 157	400 State Reapportionment 410 Antitrust		
130 Miller Act 140 Negotiable Instrument	315 Airplane Product Liability	Product Liab 367 Health Care/	inty	690 Other	28 USC 137	430 Banks and Banking		
150 Recovery of Overpayment	320 Assault, Libel &	Pharmaceutic	al		PROPERTY RIGHTS	450 Commerce		
& Enforcement of Judgment	Slander	Personal Injur			820 Copyrights	460 Deportation		
151 Medicare Act X 152 Recovery of Defaulted	330 Federal Employers' Liability	Product Liabi 368 Asbestos Per			830 Patent 840 Trademark	470 Racketeer Influenced and Corrupt Organizations		
Student Loans	340 Marine	Injury Produ			o to tradenant	480 Consumer Credit		
(Excludes Veterans)	345 Marine Product	Liability		LABOR	SOCIAL SECURITY	490 Cable/Sat TV		
153 Recovery of Overpayment of Veteran's Benefits	Liability 350 Motor Vehicle	PERSONAL PRO 370 Other Fraud	PERTY	710 Fair Labor Standards Act	861 HIA (1395ff) 862 Black Lung (923)	850 Securities/Commodities/ Exchange		
160 Stockholders' Suits	355 Motor Vehicle	371 Truth in Lend	ling	720 Labor/Management	863 DIWC/DIWW (405(g))	890 Other Statutory Actions		
190 Other Contract	Product Liability	380 Other Person		Relations	864 SSID Title XVI	891 Agricultural Acts		
195 Contract Product Liability 196 Franchise	360 Other Personal Injury	Property Dam 385 Property Dam		740 Railway Labor Act 751 Family and Medical	865 RSI (405(g))	893 Environmental Matters 895 Freedom of Information		
196 Flanciuse	362 Personal Injury -	Product Liabi		Leave Act		Act		
	Medical Malpractice			790 Other Labor Litigation		896 Arbitration		
REAL PROPERTY 210 Land Condemnation	CIVIL RIGHTS	PRISONER PETIT	TIONS.	791 Employee Retirement Income Security Act	FEDERAL TAX SUITS 870 Taxes (U.S. Plaintiff	899 Administrative Procedure Act/Review or Appeal of		
220 Foreclosure	440 Other Civil Rights 441 Voting	463 Alien Detains	ee	meome security Act	or Defendant)	Agency Decision		
230 Rent Lease & Ejectment	442 Employment	510 Motions to V			871 IRS—Third Party	950 Constitutionality of		
240 Torts to Land	443 Housing/	Sentence			26 USC 7609	State Statutes		
245 Tort Product Liability 290 All Other Real Property	Accommodations 445 Amer. w/Disabilities	530 General 535 Death Penalt	v	IMMIGRATION	1			
250 7m Other Real Property	Employment	Other:	,	462 Naturalization Application				
	446 Amer. w/Disabilities	540 Mandamus &	Other	465 Other Immigration				
	Other 448 Education	550 Civil Rights 555 Prison Condi	tion	Actions				
	446 Eddcation	560 Civil Detaine						
		Conditions of	f					
		Confinement						
V. ORIGIN (Place an "X" in		anded from	4	Reinstated or 5 Tran	sferred from 6 Multidis	trict		
		ellate Court	4	Reopened Anot	her District Litigatio			
	•			(spec				
	Cite the U.S. Civil Statu	te under which you	are filir	ng (Do not cite jurisdictional statu	tes unless diversity):			
VI. CAUSE OF	28 U.S.C. 1345							
ACTION	Brief description of caus	e:						
	Enforced Collection	ons						
VII. REQUESTED IN	CHECK IF THIS IS	A CLASS ACTIO	ON	DEMAND \$	CHECK YES only	if demanded in complaint:		
COMPLAINT:	UNDER RULE 23,	F.R.Cv.P.			JURY DEMAND:	Yes X No		
VIII. RELATED CASE	7(8)							
IF ANY	(See instructions):			1	DOOKET W. DED			
IF ANI	·	JYDGE	/	<u></u>	DOCKET NUMBER			
DATE / / //	I	SIGNATURE OF A	TTORNE	Y OF RECORD				
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FOR OFFICE USE ONLY		<del>"                                    </del>	/ V	12.12				

## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES (	OF AMER	NICA Plaintiff	CIVIL ACTION NO.	
VS.				
ROBERT YOUNG		Defendant		
shall complete a cas complaint and serve form.) In the event the defendants shall, with	se Manag a copy or hat the de h their fir managen	ement Track Designation and defendants. (See § 1:6 fendants do not agree with st appearance, submit to the nent track designation form	Reduction Plan of this court, counsel Form in all civil cases at the time of 3 of the plan set forth on the reverse in the plaintiff regarding said designation clerk of court and serve on the plain specifying the track to which those	of filing the side of this ion, that the ntiff and all
SELECT ONE OF	THE FO	LLOWING CASE MAN	AGEMENT TRACKS:	
	(a)	Habeas Corpus Cases §2241 through §2255.	brought under 28 U.S.C.	( )
	(b) Social Security Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits.			
	(c)	Arbitration Cases req arbitration under Local	uired to be designated for Civil Rule 53.2.	( )
	(d) Asbestos Cases involving claims for pe or property damage from exposure to asb			( )
	(e)	(a) through (d) that are and that need special or	Cases that do not fall into tracks commonly referred to as complex intense management by the court. If form for a detailed explanation of ses.)	()
	(f)	Standard Management - any one of the other tra	Cases that do not fall into	( <b>X</b> )
10/3/2016 Date		<u> </u>	mist flew	
		Attorn Pennsy Suite 50 701 Ma	s I. Puleo, Esq. ey for Plaintiff, United States of An Ivania Attorney I.D. No. 27615 000 – BNY Independence Center arket Street Elphia, PA 19106-1532	1erica

Philadelphia, PA 19106-1532 (215) 825-6305 (Direct) FAX (215) 825-6405

email: Tpuleo@kmllawgroup.com

## UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA – DESIGNATION FORM to be used by counsel to indicate the category of the case of the purpose of assignment to appropriate calendar.

Address o	of Plaintiff: <u>c/o Suite 5000 – </u>	BNY Independence Center, 7	01 Market S	treet, Philadelphia, P	A 10106-1532		
Address o	of Defendants: <u>4820 N. Warn</u>	ock Street Philadelphia, PA 1	19141				
Place of A	accident, Incident or Transaction	: ACTION OF ENFORCED (Use Reverse Side For	COLLECTI Additional Space)	IONS			
Does this	case involve multi-district litigation	possibilities?			Yes □ No 🔣		
	D CASE, IF ANY:						
Case Num	ber:	Judge:	Date Terminated:				
Civil cass	are deemed related when yes is ar	swered to any of the following quest	ions:				
1. Is this	s case related to property included	in an earlier numbered suit pending	or within one ye Yes [		action in this court?		
		of fact or grow out of the same transa	action as a prior	suit pending or within on	e year previously terminated action in		
this court?			Yes [	□ No 🔀			
	this case involve the validity or inf	ringement of a patent already in suit	or any earlier n	umber case pending or w	thin one year previously terminated		
action	in this court:		Yes I	□ No 🔀			
A. 1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11.	ace in ONE CATEGORY ONL  Federal Question Cases Indemnity Contract, Man FELA Jones Act-Personal Injury Antitrust Patent Labor-Management Rela Civil rights Habeas Corpus Securities Act(s) Cases Social Security Review C All other Federal Questio (Please specify) Foreclosure of	ne contract, and All Other Contracts  tions  ases n Cases		Airplane Persor Assault, Defar Marine Persor Motor Vehicle Other Persona Products Liabi Products Liabi All other divers (Please specify)	tract and Other Contracts onal Injury nation ial Injury Personal Injury il Injury (Please specify) lity Asbestor		
ı, Thoma	as I. Puleo, Esq, counsel of re	cord do here by certify:					
		2.2. Section 2©(2), that to the best on the post on the post of the exclusive of interest and costs?	f my knowledge	e and belief, the damages	recoverable in this civil action case		
	☐ Relief other than monetary da	amages is sought.					
DATE: _10	<u>0/3/16</u>	Attorney-a	at-Law	lll4sig)	<u>27615</u> Attorney i.d.#		
<b>N</b>	NOTE: A trial de novo wil	I be a trial by jury only if the	ere has beer	n compliance with F	R.C.P. 39.		
I certify the noted about DATE: _10	ve.	se is not related to any case how per  Attorney-	J Ske	one year previously termin	ated action in this court except as  27615  Attorney i.d.#		

CIV 609 (9/99)

#### UNITED STATES DISTRICT COURT

#### FOR THE

#### EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

**Plaintiff** 

CIVIL NO.

vs.

ROBERT YOUNG

**Defendant** 

#### **COMPLAINT**

The United States of America, on behalf of its Agency, U.S. Department of Education, by its specially appointed counsel, Thomas I. Puleo of KML LAW GROUP, P.C., represents as follows:

- 1. This Court has jurisdiction pursuant to 28 U.S.C. 1345.
- 2. The last-known address of the Defendants, ROBERT YOUNG ("Defendant") is 4820 N. Warnock Street, Philadelphia, PA 19141.
- 3. That the defendant is indebted to the plaintiff in principal amount of \$1,967.13, plus interest of \$2,335.88, for a total of \$4,303.01. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit "A" ("Certificate of Indebtedness").
- 4. Demand has been made upon Defendant by Plaintiff for the sum due but the amount due remains unpaid.

WHEREFORE, the plaintiff demands judgment against Defendant as follows;
(A) In the amount \$4,303.01.

- (B) Plus filing fee allowed pursuant to 28 U.S.C., Section 1914 in the sum of \$150.00.
- (C) Interest from the date of judgment at the legal rate of interest in effect on the date of judgment until paid in full.
- (D) Costs of suit.

Notice is hereby given to Defendant that Plaintiff intends to seek satisfaction of any judgment rendered in it favor in this action from any debt accruing.

United States of America by and through its specially appointed counsel

KML Law Group, P.C.

By: Myray & II

Thomas I. Puleo, Esquire BNY Independence Center

701 Market Street

Suite 5000

Philadelphia, PA 19106-1532

(215)825-6309

TPuleo@kmllawgroup.com

#### UNITED STATES DISTRICT COURT

FOR THE

EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Plaintiff

CIVIL NO.

VS.

**ROBERT YOUNG** 

**Defendant** 

## **EXHIBITS**

"A" CERTIFICATE OF INDEBTEDNESS

# U. S. DEPARTMENT OF EDUCATION SAN FRANCISCO, CALIFORNIA

#### **CERTIFICATE OF INDEBTEDNESS #1 OF 1**

ROBERT YOUNG 4820 N WARNOCK ST. PHILADELPHIA, PA 19141-3941 Account No. XXXXX0425

I certify that U.S. Department of Education records show that the BORROWER named above is indebted to the United States in the amount stated below plus additional interest from 09/22/16.

On or about 11/06/92 and 04/17/93, the BORROWER executed promissory notes to secure loans of \$1,750.00 and \$875.00 from National City Bank, Indiana, formerly Merchants National Bank, Indianapolis, IN. This loan was disbursed for \$875.00 on 12/04/92 and \$875.00 on 05/24/93 at a variable rate of interest to be established annually by the Department of Education. The loan obligation was guaranteed by United Student Aid Funds, Inc., and then reinsured by the Department of Education under loan guaranty programs authorized under Title IV-B of the Higher Education Act of 1965, as amended, 20 U.S.C. 1071 et seq. (34 C.F.R. Part 682). The holder demanded payment according to the terms of the note, and credited \$0.00 to the outstanding principal owed on the loan. The BORROWER defaulted on the obligation on 08/30/95, and the holder filed a claim on the loan guarantee.

Due to this default, the guaranty agency paid a claim in the amount of \$1,967.13 to the holder. The guarantor was then reimbursed for that claim payment by the Department under its reinsurance agreement. Pursuant to 34 C.F.R. § 682.410(b)(4), once the guarantor pays on a default claim, the entire amount paid becomes due to the guarantor as principal. The guarantor attempted to collect this debt from the BORROWER. The guarantor was unable to collect the full amount due, and on 12/14/05, assigned its right and title to the loan to the Department.

Since assignment of the loan, the Department has credited a total \$0.00 in payments from all sources, including Treasury Department offsets, if any, to the balance. After application of these payments, the BORROWER now owes the United States the following:

Principal: \$1,967.13

Interest: \$2,335.88

Total debt as of 09/22/16: \$4,303.01

Interest accrues on the principal shown here at the current rate of 3.45% and a daily rate of \$0.18 through June 30, 2016, and thereafter at such rate as the Department establishes pursuant to section 427A of the Higher Education Act of 1965, as amended, 20 U.S.C. 1077a.

Pursuant to 28 U.S.C. § 1746(2), I certify under penalty of perjury that the foregoing is true and correct.

Executed on: 09/30/16

Christopher Bolander

Loan Analyst

Litigation Support Unit